



August 23, 2011

Mr. Garnett Brown
City of Atlanta
Bureau of Planning
55 Trinity Avenue
Suite 3350
Atlanta, Georgia 30303

Subject: Summary of Environmental Consulting Services
Campbellton Plaza Shopping Center
2020 Campbellton Road
Atlanta, Georgia
AMEC Project no. 6121-11-0019 Task 03

Dear Mr. Brown:


AMEC E&I, Inc. (AMEC, formerly MACTEC), is pleased to submit this report of environmental consulting services related to the Campbellton Plaza Shopping Center located at 2020 Campbellton Road in Atlanta, Georgia. Our services included an evaluation of current and past site and surrounding land usage and available soil and groundwater testing data relative to current environmental regulations. The purpose was to characterize environmental conditions in relation to the City of Atlanta's goals for revitalization of the site and surrounding area.

This report is intended for the use of the City of Atlanta, subject to the contractual terms agreed to for this project. Reliance on this document by any other party is prohibited without the express written consent of the City of Atlanta and that party's execution of mutually agreeable terms and conditions with AMEC. Use of this report for purposes beyond those reasonably intended by the City of Atlanta and AMEC will be at the sole risk of the user.

This report presents project information which includes procedures and limitations along with our findings, conclusions and recommendations. If you have any questions about this document, please contact us at your convenience.

Sincerely,

AMEC E&I, Inc.


Steven S. Davenport
Project Geologist

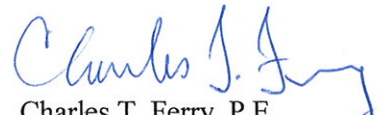

Charles T. Ferry, P.E.
Senior Principal Engineer

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1.0 BACKGROUND

The City of Atlanta authorized AMEC to provide environmental consulting services in support of potential revitalization of the Campbellton Road/Myrtle Drive area. Our services were performed under the City of Atlanta's 2010 U.S. EPA Community Wide Brownfield Assessment Grant (BF-95461210-0).

AMEC performed a reconnaissance of the site and surrounding properties, conducted interviews and reviewed available historical and regulatory information to develop an understanding of potential and known environmental issues at the site. The following sources were referenced:

- Topographic map, 7.5-Minute Series, Southwest Atlanta Quadrangle, dated 1954, photorevised 1968, 1973, and 1983, published by the United States Geological Survey (USGS);
- Topographic maps, 7.5-Minute Series, Southwest Atlanta Quadrangle, dated 1993 and 1997, published by the United States Geological Survey (USGS);
- Aerial photographs dated 1938, 1940, 1955, 1960, 1968, 1972, 1978, 1986, 1989, 1993, 2005 and 2007 obtained from EDR;
- City Directories, various years, 1905 through 2005, obtained from EDR;
- Fulton County property tax records; and
- Interview with Mr. Guy Banks, property manager, August 5, 2011.

Refer to Figure 1: Property Location and Topographic Map and to Figure 2: Site and Surrounding Property Layout.

1.1 SITE USE

The site consists of an assemblage of three parcels having a total area of approximately 12 acres. The site is currently developed with an approximate 100,000 square-foot strip shopping center, associated parking, landscaped areas and four free-standing buildings. Tenants of the main shopping center building include restaurants and retail stores.

Two of the free-standing buildings front on Campbellton Road in the northwest corner of the property. One of the two buildings is occupied by a check cashing business, the other building, a former bank, is currently vacant. The third building, also located at the northwest corner of the site, fronts DeLowe Drive and is occupied by a restaurant.

A dry cleaner, New Plaza Cleaners, occupies the fourth free-standing building located at the southeast corner of the property and fronts on Myrtle Drive. According to a New Plaza Cleaners employee, no dry cleaning is currently performed at that location.

A cellular phone tower is also present on the property on the east side of the shopping center building. According to Mr. Banks, the tower is equipped with an emergency generator. However, at the time of our site visit, no generator or its associated fuel tank were observed.

Aerial photographs show the site to be partially wooded farmland in the 1930s and 1940s prior to construction of the main shopping center building in the late 1950s. Additions to the shopping center building were noted in the late 1960s. Two of the free-standing buildings, including the buildings at the northwest and southeast corners of the site, were built in the early 1960s. The two additional buildings located near the site's northwest corner were built in the 1970s.

City directories revealed that tenants of the main shopping center building largely consisted of retail stores, barber/beauty shops and restaurants throughout its history.

The building at the southeast corner of the site has housed a dry cleaner, formerly Plaza Cleaners and currently New Plaza Cleaners, since it was built in the 1960s.

The building at the northwest corner of the site operated as a gas station (Campbellton Plaza Gulf) from the 1960s through the early 1980s. Since the 1980s, the building has housed various retail/commercial businesses including the current check cashing business.

The two additional buildings, located immediately east and south of the former gas station were built in the 1970s and operated as a bank and a restaurant, respectively. The bank building is currently vacant.

1.2 SURROUNDING LAND USE

Properties immediately north of the site, across Campbellton Road are commercially developed. Current businesses generally include restaurants, retail stores and a gas station.

Commercial development of the properties north of the site began in the late 1950s and continued into the 1960s. Historical resources revealed several businesses with the potential to release regulated substances on properties north of the site. From east to west, these businesses are as follows:

Address	Dates of Operation	Name/Description
2065 Campbellton Rd	Early 1960s-Mid 1970s	Barfield Service Station, Conley Standard
2075 Campbellton Rd	Late 1950s-Early 1990s	Hindsman Service Station, Wynne's Texaco
2105 Campbellton Rd	Early 1960s-Early 1990s	Landers Cleaners and Laundry
2109-2115 Campbellton Road	Middle 1950s-Early 1960s Early 1950s-Early 1960s Early 1960s-Present	Piedmont Laundry and Cleaners Adams Park Service Station Plaza Amoco/Shell
1771 DeLowe Drive	1970s Early 1980s	Lawler's Car Care Amoco Service Station Annex

The properties immediately east of the site across Myrtle Drive and south of the site are currently developed as apartment/condominium complexes. Shamrock Gardens Apartments is to the east and DeLane Court Condominiums is to the south. A day care center is also present south of the site fronting DeLowe Drive. Historical resources revealed that these were partially wooded farmland prior to development of the apartment complexes in the 1960s. No historical activities of potential environmental concern are expected at these properties.

Properties immediately west of the site across DeLowe Drive are commercially developed. Current and past businesses include retail stores, restaurants and offices.

2.0 AREA TOPOGRAPHY

The site is situated on the southeast flank of a ridgeline that trends generally northeast-southwest and crests just north of Campbellton Road at approximate elevation 998 feet. Grades on-site range from a high elevation of 976 feet along Campbellton Road to low elevations along the southern boundary of 946 feet at DeLowe Drive and 956 feet at Myrtle Drive. Based on our observations, surface drainage across the site is generally toward the south-southwest and is largely controlled by storm drains and discharged into the local storm sewer system. Surface drainage along Campbellton Road, Myrtle Drive and DeLowe is controlled by curbing and storm drains.

In the Piedmont Physiographic Region, groundwater generally occurs under water table conditions and generally flows in directions subparallel to the original ground surface slopes and under the influence of gravity toward points of discharge such as creeks, swamps, drainage swales or pumped groundwater wells. Based on the site and area topography, groundwater flow is interpreted to be generally toward the south-southwest except in the eastern side of the site where groundwater flow appears to be toward the south and southeast.

Wet soils and/or groundwater in the vicinity of New Plaza Cleaners were reported between 28 and 29 feet in June 1997 and between 21 and 22 feet in February 2010. Wet soils and/or groundwater were reported between 15 and 20 feet at the sampling locations along Campbellton Road. We note that neither well casing elevations nor more specific depths to groundwater were documented in the provided reports; as such, calculations to more accurately interpret the direction of groundwater flow could not be performed.

Based on our interpretation of the direction of groundwater flow and the interpreted extent of the site's upgradient watershed, off-site, upgradient concerns include: the former and current service stations between 2065 and 2115 Campbellton Road and the former cleaners between 2105 and 2109 Campbellton Road. The former service station and auto service facilities at 1771 DeLowe Drive appear to be side gradient.

3.0 ENVIRONMENTAL CONDITIONS

Refer to Figure 3: Available Soil Analytical Data and Figure 4: Available Groundwater Analytical Data, along with the following discussion. Available laboratory data are summarized in Tables 1 and 2 in the Appendix.

AMEC's understanding of the environmental conditions at the shopping center site and at the adjacent Shamrock Gardens Apartments is based on our review of the following documents provided to AMEC by Atlanta Development Authority and/or obtained through a review of regulatory files maintained by the Georgia Environmental Protection Division (EPD):

- Release Notification for Dry Cleaner at Campbellton Plaza (New Plaza Cleaners), dated July 4, 1997, prepared by Clayton Environmental Consultants;
- Release Notification for Former Service Station at Campbellton Plaza (Campbellton Plaza Gulf), dated July 4, 1997, prepared by Clayton Environmental Consultants;
- 'No Listing Letter' for Campbellton Plaza, New Plaza Dry Cleaners, dated September 25, 1997, issued by Georgia Environmental Protection Division;
- 'No Listing Letter' for Campbellton Plaza, Former Service Station, dated September 25, 1997, issued by Georgia Environmental Protection Division;
- Release Notification for Shamrock Gardens Apartments, dated April 9, 1998, prepared by AEM;
- 'No Listing Letter' for Shamrock Gardens Apartments, dated June 1, 1998, issued by Georgia Environmental Protection Division;
- Limited Phase II Subsurface Investigation Report, dated June 9, 2009, prepared by Property Solutions Environmental Engineering and Consulting;
- Release Notification for Shamrock Gardens Apartments, dated July 31, 2009;
- Supplemental Release Notification Letter, dated November 3, 2009, issued by Georgia Environmental Protection Division;
- Limited Phase II Environmental Investigation report, dated February 17, 2010, prepared by Bureau Veritas North America, Inc;
- Limited Phase II Environmental Site Assessment, dated March 12, 2010, prepared by Universal Engineering Sciences;
- 'HSI Listing Letter' for New Plaza Cleaners, dated April 27, 2010, issued by Georgia Environmental Protection Division;
- 'HSI Sublisting Letter' for Shamrock Garden Apartments, dated April 27, 2010, issued by Georgia Environmental Protection Division;
- Summary of Meeting with Georgia Environmental Protection Division, dated April 30, 2010, prepared by Hartman Simons & Wood, LLP; and

- Sublisting Clarification letter, dated June 4, 2010, issued by Georgia Environmental Protection Division.

According to information contained in the July 1997 Release Notifications, a Phase II Environmental Site Assessment was conducted at the site in May 1997 by Clayton Environmental Consultants. Soil and groundwater testing for volatile organic compounds (VOCs) was conducted at three locations around the former gas station at the northwest corner of the property and at two locations around the New Plaza Cleaners at the southeast corner of the property.

Constituents detected around the dry cleaner included cis-1,2-dichloroethene, trichloroethene and tetrachloroethene in soil and groundwater and trans-1,2-dichloroethene in groundwater.

Constituents detected around the former gas station include cis-1,2-dichloroethene, trichloroethene, tetrachloroethene, benzene, toluene, ethylbenzene and xylenes in groundwater. Soil sampling was not conducted.

The 1997 Release Notifications also indicated that the nearest drinking water wells are 2 to 3 miles from the site.

Based on the data contained in the release notifications, the EPD issued 'No Listing' letters on September 25, 1997 for the two releases reported at the site. We note, however, that an EPD Memorandum included with the EPD letters indicated the possibility that one or more drinking water wells may exist within 1 to 2 miles of the site.

According to information contained in the April 1998 Release Notification, a Phase II environmental assessment was conducted on the Shamrock Gardens property adjacent to the site to the east across Myrtle Drive. Soil and groundwater testing was conducted at two locations directly across Myrtle Drive to check for impacts from New Plaza Cleaners and at four locations along Campbellton Road to check for impacts from off-site concerns on the north side of Campbellton Road. Tetrachloroethene was detected in soils from one of the two soil sample locations across from New Plaza Cleaners and in both groundwater sampling locations. Tetrachloroethene was detected in soils in two of the four sample locations and in all four groundwater sample locations along Campbellton Road. Trichloroethene and 1,1,1,2-tetrachloroethane were also detected in groundwater at two of the four locations.

Based on the data contained in the release notification, the EPD issued a 'No Listing' letter on June 1, 1998 for the release reported on the Shamrock Gardens property.

According to the June 9, 2009 Limited Phase II Subsurface Investigation report, Property Solutions conducted additional testing of soil and groundwater on the Shamrock Gardens property to further evaluate the concerns identified along Campbellton Road. During this sampling event, VOCs including carbon disulfide and tetrachloroethene were detected in one of three soil samples tested. Lead was detected in each of the three soil samples. Polynuclear aromatic hydrocarbons (PAHs) were not detected above laboratory reporting limits in soils. Additionally, two groundwater samples were tested for VOCs, PAHs and lead. Constituents detected in one or both of the groundwater samples included methyl tert butyl ether, tetrachloroethene, trichloroethene and lead. PAH constituents were not detected in groundwater.

These results were reported to the EPD in a Release Notification dated July 31, 2009. The EPD responded to the Release Notification in letters dated November 3, 2009 to the owners of the Campbellton

Plaza Shopping Center and Shamrock Gardens apartments requesting additional sampling in the vicinity of New Plaza Cleaners on both properties.

Additional sampling was conducted on the subject site around the dry cleaner by Bureau Veritas in February 2010 and was summarized in their Limited Environmental Investigation report dated February 17, 2010. The additional investigation consisted of soil and groundwater sampling at five locations around the dry cleaner building. Soil and groundwater samples were tested for VOCs. Soil constituents detected included chloroform, cis-1,2-dichloroethene, trans-1,2-dichloroethene, 1,1,1,2-tetrachloroethane, tetrachloroethene and trichloroethene. Groundwater constituents detected included acetone, chloroform, 1,1-dichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, methylene chloride, tetrachloroethene, trichloroethene and vinyl chloride.

Additional sampling was conducted on the Shamrock Gardens property by Universal Engineering Sciences in February 2010 and was summarized in their Limited Phase II Environmental Site Assessment report dated March 12, 2010. This additional assessment consisted of testing soil and groundwater at one location directly across Myrtle Drive from the dry cleaner for VOCs. No VOCs were detected above laboratory quantitation limits in soil. VOC constituents detected in groundwater included chloroform and tetrachloroethene.

The results of both the Bureau Veritas and Universal assessments were reported to the EPD. Based on these results, the EPD determined that the chlorinated solvents detected on the Shamrock Gardens property are the same as those detected around the dry cleaner. Under the authority of the Hazardous Site Response Act (HSRA), the EPD listed the 11.15-acre shopping center site on the Hazardous Site Inventory as New Plaza Cleaners, HSI #10908, as a result of a release of tetrachloroethene in soil at levels exceeding a reportable quantity. A 3.01-acre parcel of the Shamrock Gardens Apartments property was sublisted as part of the HSI site. The release was assigned a Class II designation.

As part of our site reconnaissance, AMEC attempted to locate previous sampling locations and determine whether there are viable monitoring wells remaining at any of the reported sampling locations. No remaining monitoring wells were observed during our site reconnaissance.

4.0 REGULATORY ISSUES

Based on the assembled information, AMEC offers the following comments:

- As shown on Figure 5: Interpreted Groundwater Contaminant Plumes, there appears to be at least three areas of groundwater impact which have affected portions of Campbellton Plaza Shopping Center and/or Shamrock Garden Apartments. The only condition which is definitely regulated at present is the soil and groundwater contamination originating from the New Plaza Cleaners facility. Groundwater impacts along Campbellton Road appear to have migrated onto the shopping center and apartment complex properties from businesses which have operated off-site north of Campbellton Road.
- The new Plaza Cleaners HSI listing encompasses almost the entire Campbellton Plaza Shopping Center property, except for the outparcels occupied by the vacant former bank building and the check cashing business. As such, there is question whether the contaminant plume in the northwest corner of the shopping center, which is clearly not related to the on-site cleaners, is regulated under HSRA as part of the HSI listing. This issue should be further explored.
- The Shamrock Gardens Apartments sub-listing encompasses only a portion of the apartment complex property in the southwest quadrant. As such, it appears that the contaminant plume in the northern portion of the property is not currently regulated under HSRA.
- Significant soil and groundwater contamination has been identified in relation to the release(s) at the new Plaza Cleaners which will eventually require remediation in order to remove the site from the HSI. The site is currently designated as Class II, which means the EPD has not yet required a responsible party to perform corrective action. However, at some point the EPD will re-designate the site as Class I requiring corrective action within a certain time period. The responsible party can be pro-active or wait for the EPD to require action.
- Whenever corrective action is performed, further assessment will be necessary to address the following issues at a minimum:
 - Horizontal and vertical delineation of soil impacts to below laboratory detection limits.
 - Horizontal and vertical delineation of groundwater impacts to below drinking water standards.
 - Characterization of site hydrogeology.
 - Calculation of risk reduction standards (RRS) for soil and groundwater based on expected site use.
- A Soil and Groundwater Sampling and Analysis Plan (SAP) should be developed to begin to address these issues. This will likely entail an iterative process of phased field work and data evaluation.
- Eliminating regulatory oversight of the subject property will be an important step in the revitalization of the area and can only be achieved through a process of delisting the site from the HSI. This could be a lengthy, complicated and costly process.
- Even upon delisting, there will be residual contamination of soil and groundwater in the area that is not necessarily regulated but will potentially affect the planning and cost of development at certain locations.

Available Soil Analytical Data
Campbellton Plaza Shopping Center
AMEC Project No. 6122-11-0019

Sample ID	B4-15	B5-10	SB-1*	SB-2*	SB-3*	SB-4*	SB-5*	SB-6*	SB-01*	SB-02*	SB-03*	SB-1	SB-2	SB-3	SB-4	SB-5	BB-1
Sample Depth (ft)	15	10	NR	NR	NR	NR	NR	NR	28-29	11.5-12	11.5-12	16-18	10-12	16-18	10-12	18-20	8-12
Date	5/6/1997	5/6/1997	2/12/1998	2/12/1998	2/12/1998	2/12/1998	2/12/1998	2/12/1998	5/22/2009	5/22/2009	5/22/2009	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/17/2011
VOCs (mg/Kg)																	
Carbon Disulfide	<0.005	<0.005							0.00988	BDL	BDL	<0.095	0.089	<0.12	<0.091	<0.099	<0.018
Chloroform	<0.01	<0.01										<0.0047	0.0056	<0.0062	<0.0046	<0.0049	<0.0089
Cis-1,2-dichloroethene	0.251	0.032										<0.0047	0.39	0.041	0.16	0.041	<0.0089
Trichloroethene	0.08	0.008	BDL	BDL	BDL	BDL	BDL	BDL				<0.0047	0.14	0.022	0.25	0.031	<0.0089
1,1,1,2-Tetrachloroethene			BDL	BDL	BDL	BDL	BDL	BDL				<0.0047	<0.0045	<0.0062	0.02	<0.0049	NR
Tetrachloroethene	0.0823	0.042	BDL	0.005	0.014	BDL	0.052	BDL	0.0394	BDL	BDL	0.028	1.2	0.44	81	0.47	<0.0089
Trans-1,2-dichloroethene	<0.005	<0.005										<0.0047	0.0047	<0.0062	<0.0046	<0.0049	<0.0089
PAHs (mg/Kg)	NT	NT	NT	NT	NT	NT	NT	NT	BDL	BDL	BDL	NT	NT	NT	NT	NT	NT
Lead (mg/Kg)	NT	NT	NT	NT	NT	NT	NT	NT	9.08	11.5	8.37	NT	NT	NT	NT	NT	NT

- mg/Kg
- *

NR

BDL

NT
- Milligrams per kilogram

- No lab report available, data obtained from report summary tables

- Not reported

- Below laboratory detection limit

- Sample not tested for constituent

Available Groundwater Analytical Data
Campbellton Plaza Shopping Center
AMEC Project No. 6122-11-0019

Sample ID	MW-1	MW-2	MW-3*	MW-4*	MW-5*	SB-1*	SB-2*	SB-3*	SB-4*	SB-5*	SB-6*	DUP (SB-2)*	SB-02*	SB-03*	SB-1	SB-2	SB-3	SB-4 (Deep)	SB-4 (Shallow)	SB-5	GW-1
Sample Date	5/16/1997	5/16/1997	5/16/1997	5/16/1997	5/16/1997	2/12/1998	2/12/1998	2/12/1998	2/12/1998	2/12/1998	2/12/1998	2/12/1998	5/22/2009	5/22/2009	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/3/2010	2/17/2010
VOCs (µg/L)																					
Acetone	<50	<50	<50	<250	<250										<25	<25	<25	<25	<25	32	<50
Chloroform	<10	<10	<10	<25	<25										1.9	1.2	2	14	1.7	<1	20
Methyl tert Butyl Ether													BDL	6.23	<1	<1	<1	<1	<1	<1	<5
Trans-1,2-dichloroethene	<5	<5	<5	<5	92										<1	<1	1.7	100	2.6	13	<5
Cis-1,2-dichloroethene	364	327	<5	358	2051										<1	8.5	44	3500	50	53	<5
1,1-Dichloroethene	<5	<5	<5	<25	<25										<1	<1	<1	1.1	<1	<1	<5
1,1,1,2-Tetrachloroethane	NR	NR	NR	NR	NR	BDL	BDL	BDL	2	BDL	BDL	BDL			<1	<1	<1	<1	<1	<1	<5
Benzene	166	12	<5	<5	<5										<1	<1	<1	<1	<1	<1	<5
Methylene Chloride	<50	<50	<50												<1	<1	<1	1.1	<1	<1	<5
Trichloroethene	373	315	9	263	2251	BDL	BDL	7	6	BDL	BDL	BDL	31.6	BDL	<1	3.7	32	1000	20	93	<5
Tetrachloroethene	116	85	13	2499	14569	12	190	10	1800	3	150	120	1000	1.03	29	49	580	14000	190	210	52
Toluene	672	25	<5	<5	<5										<1	<1	<1	<1	<1	<1	<5
Ethylbenzene	211	34	<5	<5	<5										<1	<1	<1	<1	<1	<1	<5
Vinyl Chloride	<5	<5	<5	<25	<25										<1	<1	<1	1.5	<1	<1	<5
Xylenes	1195	108	<5	<5	<5										<3	<3	<3	<3	<3	<3	<5
SVOCs (µg/L)	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	BDL	BDL	NT	NT	NT	NT	NT	NT	NT
Lead (mg/L)	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	NT	BDL	0.32	NT	NT	NT	NT	NT	NT	NT

- µg/L
- mg/L
- *
- NR
- BDL
- NT
- Micrograms per Liter
- Milligrams per Liter
- No lab report available, data obtained from report summary tables
- Constituent not reported
- Below laboratory detection limit
- Sample not tested for constituent